

Belcore

Ⓢ Bell Communications Research

DOCKET FILE COPY ORIGINAL

Michael S. Slomin
Senior Attorney

LCC-2B336
290 West Mt. Pleasant Avenue
Livingston, New Jersey 07039-2798
201-740-6390
Fax 201-740-6846

EX PARTE OR LATE FILED

May 28, 1993

RECEIVED

JUN - 1 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Donna R. Searcy, Secretary
Federal Communications Commission
1919 M Street, N. W.
Washington, D. C. 20554

Re: CC Docket No. 92-237, Phase II

Dear Ms. Searcy,

Attached please find copies of a letter of this date from the Director, NANP Administration to the Acting Chief, Common Carrier Bureau. Since the subject of this letter could be viewed as related to the subject of the Phase II proceedings in CC Docket No. 92-237, the Commission's inquiry on administration of the North American Numbering Plan, I would ask that copies of this correspondence be associated with the docket file in that proceeding, and that you stamp and return one copy of this correspondence to me for my files.

Thank you for your attention to this matter.

Sincerely,


Michael S. Slomin

Attachment

No. of Copies rec'd 845
List A B C D E



EX PARTE OR LATE FILED

Ronald R. Conners
Director NANP AdministrationLCC 1B-233
290 West Mt. Pleasant Avenue
Livingston, New Jersey 07039
201-740-4645

May 28, 1993

RECEIVED**JUN - 1 1993****FEDERAL COMMUNICATIONS COMMISSION**
OFFICE OF THE SECRETARY**Ms. Kathleen Levitz, Esquire**
Acting Chief, Common Carrier Bureau
Federal Communications Commission
1919 M Street, N. W.
Washington, D.C. 20554

Dear Ms. Levitz,

This is a report on the status of the Carrier Identification Code (CIC) expansion project. On April 1, 1993, in accordance with industry-agreed plans, Feature Group B (FG B) and Feature Group D (FG D) CICs were separated into two distinct pools, and FG B CICs were expanded to 4 digits. Expansion of the FG B resource was accomplished without a hiatus of the availability of CICs primarily due to the reclamation of more than 320 CICs by NANPA during the period from August 1990 to date. The second phase of the project, Feature Group D expansion to 4 digits, has been scheduled for the first half of 1995. With the completion of FG B expansion, we now have a more accurate estimate of the number of 3-digit FG D CICs that remain available for assignment. Based on the available supply and the current assignment rate (including recent requests for codes from Canadian entities), it appears very likely that the supply of FG D CICs will exhaust earlier than previously anticipated.

As of May 1, 1993, 732 FG D CICs have been assigned, leaving 237 codes available for assignment to new entities. Over the past 6 months, NANPA has assigned an average of 16 FG D CICs/month, double the assignment rate two years ago. As a reminder, until FG D expansion is completed, the assignment of these codes continues to be limited to one per entity under conservation rules established by the industry. The situation has been further complicated by unexpected requests recently received from Canadian access providers for 10 FG D CICs to be used in preparing for the provision of equal access beginning in mid-1994, as recently specified by Canadian regulators. Canadian projections indicate that approximately 80 FG D CICs will be required to meet the needs of all Canadian equal access providers.

If current demand continues, it will be extremely difficult to maintain a supply of assignable FG D CICs until the 1H95 target date previously supported by the industry. Although NANPA monitors CIC activity closely and reclaims unused CICs assiduously, the number of codes that might be available remains unknown at this time. Without more stringent reclamation criteria or a reduction in CIC demand, it appears likely that, at some point in time prior to 1995, the supply of 3-digit FG D CICs will exhaust and NANPA will begin assigning 4-digit FG D CICs. This may well occur before access providers have had sufficient time to make the changes needed to support these 4-digit FG D CICs.

In previous correspondence, NANPA advised the Commission that a hiatus in CIC availability was likely and recommended several steps to ease the situation. Our letter of October 24, 1991, copy attached, summarized previous correspondence in which NANPA requested the Commission's assistance in reclaiming CICs in excess of 3 codes which were obtained by mergers or acquisitions. Currently, there are about 64 FG D CICs in this category that could be reclaimed. Furthermore, although the exact reasons for the increase in CIC demand is not

known, one possible factor mentioned was the First Data Resources decision allowing non-carriers to obtain CICs. We indicated that, should the demand continue to increase (as it has), we would renew our request that the Commission declare a temporary moratorium on the assignment of additional CICs to non-carriers. We believe now is the time for such a moratorium.

Based on earlier discussions within the industry, it appears unlikely that the date for FG D expansion can be moved forward. Switch vendors need considerable lead time to program and test the necessary software modifications to their switch generics, and substantial time is required to modify the large number of switches in the network.

In summary, unless the demand for FD CICs can be reduced and/or the supply expanded, it is highly probable that there will be a hiatus of unknown length in the availability of FG D CICs.



Ⓐ Bell Communications Research

G. C. Via

Vice President
Operations Technology

October 24, 1991

Mr. Richard M. Firestone
Chief, Common Carrier Bureau
Federal Communications Commission
1919 M Street, N.W., Room 500
Washington, D.C. 20554

Dear Mr. Firestone,

I am writing to update you on the status of efforts by Bellcore, as administrator of the North American Numbering Plan (NANP), to recover fifty two carrier identification codes (CICs) that were obtained by entities through mergers and acquisitions (M&A), which are to be returned for reassignment under the current CIC assignment guidelines.

In our April 10, 1991 letter we advised you of measures that might be taken by NANP administration to prevent or delay exhaustion of available three-digit CICs until four-digit CICs might be implemented. Among these was return of M&A CICs, as specified in the assignment guidelines that were the product of industry consensus. Under these guidelines, an entity gaining in excess of three domestic CICs as a result of merging with or acquiring a firm that already holds CICs is to return the excess for reassignment within two years of the merger or acquisition (or by March, 1991 for mergers and acquisitions that occurred prior to March, 1989).

In our July 10, 1991 letter, we advised that the assignment rate had increased to an average of 11 CICs per month, which increased the likelihood of CIC exhaustion prior to their expansion to four digits. This increase made it even more urgent for entities to return the M&A CICs and for local exchange carriers (LECs) to expedite expansion of Feature Group B (FG-B) CICs to four digits. Attached to this letter was a copy of our request to each of the holders of the M&A CICs requesting that they make these CICs available for reassignment as specified in the assignment guidelines. The holders were asked to respond to the FCC and to NANP administration. We also proposed that the Commission consider a temporary moratorium on assignment of CICs to non-carriers if exhaustion appeared imminent. We sought guidance from the Commission in both the April and July letters.

Five of the nine holders of the 52 M&A CICs replied. A copy of each of their responses is attached. As is shown on the attached summary, two entities have offered to return a total of 14 CICs and we are in the process of working with these entities and the LECs to

exhaust prior to FG-B expansion and that the increased demand is in fact coming from Domino Pizza-like non-carrier uses of CICs, we will strongly renew our proposal that the Commission declare a temporary moratorium on the assignment of CICs to non-carriers. It should be emphasized that such a moratorium would probably last for only several months.

In the meantime, we will continue to work with the industry to advance implementation of CIC expansion, and proceed with our efforts to reclaim unused CICs in anticipation that these steps will help prevent a hiatus in the availability of CICs.

Sincerely,

A handwritten signature in dark ink, appearing to read "G. C. Via". The signature is fluid and cursive, with the first name "G." and last name "Via" clearly distinguishable.

G. C. Via
Vice President
Operations Technology

Attachments

Copy (w/att.) to:

G. Vaughan
T. Spavins
P. Wynns